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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES,  
INC., PASSENGER SEXUAL  
ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB

## **DECLARATION OF JAMIE BROWN**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

### This Document Relates to:

## ALL ACTIONS

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1 I, Jamie Brown, declare under penalty of perjury as follows:

2 1. I am a Vice President of Global Advisory Services at Lighthouse, which provides  
 3 eDiscovery services to Uber Technologies Inc. (“Uber”), a Defendant in the above captioned matter.  
 4 I previously set forth my qualifications in a declaration provided in support of Uber’s ESI protocol  
 5 on April 12, 2024, which are incorporated herein.

6 2. I submit this declaration at Defendant Uber’s request and in support of its proposed  
 7 plan regarding the production of an updated set of documents with a timeframe from November 28,  
 8 2023 through December 1, 2024 (the “post-November 2023 data set”) documents. The purpose of  
 9 my declaration is to set forth an estimated timeframe to collect, process, review and produce the  
 10 post-November 2023 data set. I am familiar with the facts contained herein and am prepared to  
 11 testify to the extent required.

12 **Assumptions**

13 3. The post-November 2023 data set includes data from 28 custodians from various data  
 14 sources used by Uber employees.

15 4. The estimated time to *collect* this data differs for each source based on various  
 16 factors, including data volume and export capabilities of the underlying system. Similarly, the  
 17 estimated time to *process* the data will also vary by data source due to volume and Lighthouse’s  
 18 workflow for that data type; some data is easier and, therefore, faster for Lighthouse’s systems to  
 19 process while other data is more nuanced and requires more time. The time it takes to perform these  
 20 tasks is largely driven by the machine as opposed to human hours. Machine time is limited by the  
 21 nature of the task; adding additional computing resources to those currently improved will not  
 22 materially improve machine time requirements and may introduce errors.

23 5. The estimated *review* times are based upon several components, including time to  
 24 train the technology assisted review (TAR) model,<sup>1</sup> time to conduct the human review (for  
 25 responsiveness and privilege), and machine time. The review estimates are based on data volumes  
 26 and/or the document numbers, as opposed to the specific system, at least for this purpose.

27  
 28 <sup>1</sup> Each time new data is introduced, the TAR model must be retrained to account for novel concepts within the data set.

1       6.     Uber has completed the collection of custodial data for the 28 custodians, except for  
2 data from Slack and Google Drive, which Uber anticipates completing by December 31, 2024 and  
3 January 3, 2025 respectively.<sup>2</sup> Once complete, this data will be transferred to Lighthouse for  
4 processing, hosting and review.

5       7.     Based on the work Lighthouse has performed to date, we estimate there will be  
6 approximately two million unique documents after de-duplication (which equates to approximately  
7 72,000 documents per custodian), which must be promoted to the TAR system, a step that also  
8 requires machine time. Using the search term hit estimate of 32%, we then estimate that  
9 approximately 600,000 documents will be subject to the TAR process.

10      8.     Assuming 12-17% of the TAR review population will be sent to the review team for  
11 human review (72,000 – 102,000 documents), we estimate it will take 3-5 days to complete (based  
12 on an average review rate of 30 docs/hour at 8 hrs/day for 100 reviewers). Once reviewed, the  
13 documents will need to be QC’ed and reviewed for privilege, which we estimate will take an  
14 additional 3-5 days (based on an average review rate of 20 docs/hour at 8 hrs/day for 20 reviewers);  
15 it’s important to note that the privilege review for the post-November 2023 data set is expected to  
16 take longer than previous data sets, because the documents were generated during the pendency of  
17 the litigation.

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26       <sup>2</sup> Lighthouse obtained these estimates from Uber’s eDiscovery team and they are consistent with the timeframe  
27 Lighthouse has observed in other Uber matters. I understand Plaintiffs have questioned the time it takes to collect this  
28 data. Having worked with hundreds of clients to collect data from the same systems, the estimates provided are also  
consistent with industry norms. The time involved to collect and export broad sets of data – data that is only limited by  
timeframe and custodian – often takes weeks on end. This is normal with modern enterprise tools for communication  
and collaboration (e.g., M365, Workspace, Slack, etc), which are commonplace today.

1           9. These estimates are summarized in the chart below:

2           DATE	3           STAGE	4           DESCRIPTION
<b>5           CUSTODIAL DATA (EXCEPT SLACK AND DRIVE)</b>		
6           12/19/24	7           Collection	8           Uber completed collection of post-November 2023 data
9           12/26/24	10          Processing	11          LH to complete processing of post-November 2023 data
12          1/3/24	13          Processing	14          LH to complete search-term application and TAR promotion
15          2/4/24	16          Review	17          LH to complete TAR model training; data to be promoted to review team
18          2/12/24	19          Review	20          Review team completes review for responsiveness and initial privilege
21          2/19/24	22          Review	23          Review team completes second-level review for privilege
24          2/26/24	25          Review	26          LH completes QC and production
<b>27          SLACK AND DRIVE DATA</b>		
28          1/3/25	29          Collection	30          Uber to complete collection of post-November 2023 data
31          1/24/25	32          Processing	33          LH to complete processing of post-November 2023 data
34          1/31/25	35          Processing	36          LH to complete search term application and TAR promotion
37          2/21/25	38          Review	39          LH to complete TAR model training; data to be promoted to review team
40          2/28/25	41          Review	42          Review team completes review for responsiveness and initial privilege
43          3/7/25	44          Review	45          Review team completes second-level review for privilege
46          3/14/25	47          Review	48          LH completes QC and production

49           10. I understand the parties have discussed prioritizing 10 custodians as a means to  
 50          expedite production. If Lighthouse did that, this would result in a 5-day reduction to the  
 51          aforementioned timeline for the priority custodial data set (**for a modified production date of**  
 52          **February 21**), given that the most time-intensive portion of the process is the TAR model training.  
 53          For the Slack and Drive data, however, this would result in a 10-day reduction to the aforementioned  
 54          timeline (**for a modified production date of March 4**) total given the processing time is more  
 55          extensive for these two sources; however, there are some losses with the TAR training model given  
 56          57

1 the nature of this data. The two trade-offs that arise when you break up the custodian pool are  
2 process efficiency and the TAR model, which benefits from a broader data set.

3 11. I affirm under penalty of perjury of the laws of the State of New York that the  
4 foregoing statement is true and correct. Executed on December 20, 2024 in New York, New York.  
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6   
7 Jamie Brown  
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